



Chris Kachouroff <chris@mck-lawyers.com>

RE: 30(b)6 topics

Frey, Timothy <TFrey@beneschlaw.com>

Mon, Jul 8, 2024 at 7:51 PM

To: Chris Kachouroff <chris@mck-lawyers.com>, "Loftus, Julie" <JLoftus@beneschlaw.com>, "Bedell, James" <JBedell@beneschlaw.com>

Chris,

Responding to your emails from today:

1. We cannot do July 11 and 12, but per your separate email exchange with Julie, we can do July 23 and 24. Please confirm and we will send notices.
2. We do not agree to extend fact discovery for the purposes of providing 30(b)(6) testimony as to the breadth of the 30(b)(6) deposition topics you are seeking. As Julie explained previously, since the re-opening of fact discovery, you have not indicated any intention to seek 30(b)(6) deposition testimony of Smartmatic on topics other than those related to damages. While we are amenable to agreeing to extend the fact discovery deadline for the purposes of a 30(b)(6) damages deposition, the topics you have identified below far exceed those issues and would require Smartmatic to present a number of different witnesses. As such, we will move forward with our request for leave to take the depositions we have been seeking and note your opposition.
3. As it relates to your question about Smartmatic International Holding B.V. and SGO Corporation Limited, Plaintiffs' position is that U.S. lost profits were sustained by not only Smartmatic USA, but also Smartmatic International (by virtue of owning 100% of Smartmatic USA) and SGO (by virtue of owning 100% of Smartmatic International).

Thanks,

Tim

DEFENDANT'S
EXHIBIT**A**



vCard Bio

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Confidentiality Notice to Incorrect Addressee: www.beneschlaw.com/confidentialitynotice**From:** Chris Kachouroff <chris@mck-lawyers.com>**Sent:** Monday, July 8, 2024 12:49 PM**To:** Loftus, Julie <JLoftus@beneschlaw.com>; Frey, Timothy <TFrey@beneschlaw.com>; Bedell, James <JBedell@beneschlaw.com>**Subject:** 30(b)6 topics

Julie,

I had two days open up this week and got Lindell's calendar. I know this is short notice but can you all do the 30(b)6 depositions this week on the 11th and 12th?

For our 30(b)6 depositions, I will want to go over the following topics:

4, 5, 7 -12, 14 - 22, 26, 29, 32 (Bautista indictment)

I will also want to go over Smartmatic's Responses to Discovery and the allegations in the complaint. And last, I do want to examine the designees on the OAN settlement agreement and related communications.

I understand you will be objecting to #32 and to disclosure of the actual settlement agreement and related communications. These will be matters raised in the August 20 hearing.

To the extent that any of the topics reference international harm which I understand you all to have jettisoned, you may exclude that from preparation.

Sincerely,

Chris Kachouroff


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